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November 13, 2001

PUBLIC DOCUMENT

VIA E-MAIL

Ms. Gloria Blue
Executive Secretary
TPSC, Office of the USTR
600 17th Street, NW
Washington, DC 20508

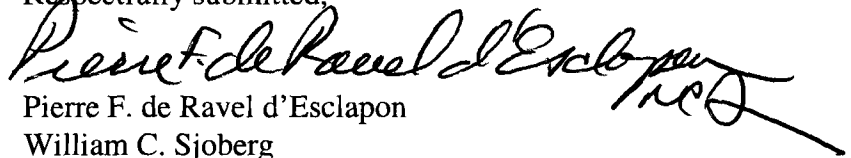
Re: Request for Exclusion from any Remedies Imposed Pursuant to the
Section 201 Investigation of Certain Steel Products – Flat and Square Bars
of High-Speed Steel

Dear Ms. Blue:

On behalf of our client, the ERAMET Group and its affiliate, Erasteel Inc., a U.S. producer and importer of high-speed steel, we hereby attach Erasteel's request that flat and square bars of high-speed steel be excluded from any remedies imposed pursuant to the Section 201 steel investigation of certain steel. As set forth in the attachment, such products are not produced in the United States and any remedies imposed would most certainly injure the U.S. industries that are dependent on imports of flat and square bars of high-speed steel for use as inputs in their production process.

Please do not hesitate to contact the undersigned should you have any questions regarding this submission.

Respectfully submitted,


Pierre F. de Ravel d'Esclapon
William C. Sjoberg

Attachment

**REQUEST FOR EXCLUSION FROM ANY REMEDIES IMPOSED PURSUANT
TO THE SECTION 201 INVESTIGATION OF CERTAIN STEEL PRODUCTS**

FLAT AND SQUARE BARS OF HIGH-SPEED STEEL

a. Commercial Name: Flat and square bars of high-speed steel

Grades: AISI M1 (HS 2-9-1), AISI M2 (HS 6-5-2), AISI 3:2 (HS 6-5-3), AISI M4 (HS 6-5-4), AISI M7 (HS 2-9-2), AISI M35 (HS 6-5-2-5), AISI M42 (HS 2-9-1-8), AISI M50 (HS 0-4-1), AND E945 (HS 2-5-1-2).

HTS No.: 7228.10.0030, 7228.10.0060, 7228.10.0010, 7228.10.9000

b. Description: Flat and square bars of high-speed steel are used to produce broaches, form tools, knives, and tool bits. The dimensions of the bars are as follows: thickness - 0.118 – 2.756 in. and width - 0.118 – 6.693 in.

c. Basis for Requesting Exclusion: Timken Latrobe, to the best of Erasteel's knowledge, is the only U.S. producer of flat and square bars of high-speed steel. Latrobe is also purchasing flat & square bars from other suppliers such as Erasteel in order to complete their range of sizes and for high-quality items.

d.

e. Names and Locations of Any Producers, in the United States and foreign countries, of the Product:

<u>Name</u>	<u>Location</u>
Erasteel Champagnole*	France
Erasteel Kloster AB*	Sweden
Timken Latrobe	United States
Bohler/Uddeholm	Austria
Hitachi	Japan
Firth Rixson	England
Thyssen	Germany
Schmidt & Clemens	Germany
Kind & Co.	Germany
Villares	Brazil
Nachi	Japan
Daido Steel	Japan
Powmex	India

*member of the ERAMET Group

- f. **Total U.S. Consumption of the Product by Quantity (short tons) and Value (000s) for Each Year 1996 to 2000 and Projected Annual Consumption for Each Year from 2001 to 2005:**

	1996	1997	1998	1999	2000
QTY.	525	605	590	650	880
VAL.	3925	4525	4410	4860	6580

	2001	2002	2003	2004	2005
QTY.	675	610	625	650	675
VAL.	5025	4420	4655	4840	5025

Basis for the projections: Marketing analysis and knowledge of the industry.

- g. **Total U.S. Production of the Product for Each Year from 1996 to 2000:**

	1996	1997	1998	1999	2000
QTY.	325	325	325	325	325
VAL.	2420	2420	2420	2420	2420

- h. **The Identity of Any U.S.-Produced Substitute for the Product, Total U.S. Production of the Substitute for Each Year 1996 to 2000 and the Names of any U.S. Producers of the Substitute:** Timken Latrobe produces some flat & square products , however relies on other suppliers such as Erasteel for the production of sizes required to complete their size ranges and also for the production of high-quality items.